

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

SHIAO-YIN HSU, a/k/a ANGEL HSU,)
)
Plaintiff,)
)
v.) Civil Action No. 1:17-cv-366
)
AD ASTRA RECOVERY SERVICES, INC,)
and THE HANOVER INS. CO)
)
Defendants.)

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441
(FEDERAL QUESTION)

TO THE HONORABLE JUDGE OF SAID COURT:

PLEASE TAKE NOTICE that Defendants Ad Astra Recovery Services, Inc. and The Hanover Insurance Company (“Defendants”) hereby remove to this Court the state court action described below.

1. On March 13, 2017, the plaintiff commenced an action in the County Court at Law No. 1, Travis County Texas, entitled *Shiao-Yin Hsu, a/k/a Angel Hsu v. Ad Astra Recovery Services, Inc. and The Hanover Ins. Co.* bearing cause number C-1-CV-17-002430. A copy of the citation and original petition served on Defendant is attached and marked as Exhibit A. A copy of Defendants’ Answer is attached and marked as Exhibit B. To the best of the undersigned’s knowledge, no other pleadings or documents, other than the documents attached hereto.

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441 in that it presents a federal question, in that Plaintiff

alleges violations of 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act (“FDCPA”).

3. Defendants were served on March 23, 2017, this removal is timely pursuant to 28 U.S.C. § 1446.

4. Also, attached as Exhibit C is a copy of the Docket sheet in the County Court.

5. As required by 28 U.S.C. § 1446, Defendant will give notice of the filing of this notice to the Plaintiff and to the clerk of the County Court at Law No. 1, Travis County Texas, where the action is currently pending.

WHEREFORE, Defendant respectfully request that the above captioned matter currently pending in the County Court at Law No. 1, Travis County Texas be removed to this Honorable Court.

Respectfully submitted,

SCANLAN, BUCKLE & YOUNG, PC

/s/ David C. Sander
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The Hanover Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2017, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court.

I further certify that on April 21, 2017, a true and correct copy of the foregoing document was served upon the following parties by Certified Mail, Return Receipt Requested:

Tyler Hickle
4005C Banister Lane
Ste. 120C
Austin, Texas 78704

/s/ David C. Sander